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January 11, 2024

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Pierre, et al., 22 Cr. 00019 (PGG)

Dear Judge Gardephe,

I write in response to the Court's Order for clarification as to why Mr. Rubin did not receive the Rose discovery in 2022. In early 2022, I sent eight emails over the course of six weeks informing all counsel that the Rose discovery was available upon request and receipt of payment for the hardware and postage. Only upon receipt of the request and the payment, were copies then burned and sent to counsel. At that time, eight out of ten retained counsel sent a request and payment for the copies of the Rose discovery which were then prepared and sent via FedEx. On January 27, 2022, I sent an email listing all counsel who had requested and paid for the Rose discovery and reminded counsel who had not contacted my office to request and pay for the data, if they wanted a copy prepared. Mr. Rubin did not receive the Rose discovery in 2022 because Mr. Rubin did not request copies of the Rose discovery from my office or send payment for the hardware or postage in response to my emails.

When Mr. Rubin contacted me earlier this week about the Rose discovery, I asked him if he would like a

copy. He requested copies and I began to duplicate the data prior to receipt of payment due to the upcoming case schedule. The hard drives completed and were tendered to FedEx this morning. An invoice for the hardware and postage for those copies was sent to Mr. Rubin this afternoon and he will receive the copies tomorrow, January 12, 2024.

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